

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)
) No. 21 CR 705-2
)
) Hon. Elaine E. Bucklo
v.)
IRVIN R. LUCAS, IV)

JOINT STATUS REPORT

The UNITED STATES OF AMERICA, by its attorney, JOHN R. LAUSCH, JR., and defendant IRVIN R. LUCAS, IV, by his attorney, DONNA HICKSTEIN-FOLEY, respectfully provide this status report concerning this case.¹

1. On November 16, 2021, a grand jury returned an indictment charging defendant and his co-defendant, Kimberly Dyson, with conspiracy to pay and receive illegal gratuities, in violation of 18 U.S.C. § 201(c), all in violation of 18 U.S.C. § 371 (Count One).

2. Defendant has been on bond since his arraignment on or about November 29, 2021, with no issues.

3. On May 25, 2022, defendant appeared by video before the Court and entered a guilty plea to Count One of the indictment. At the plea hearing, the Court set a sentencing date of August 23, 2022.

4. On August 1, 2022, the parties filed a joint motion to continue defendant's sentencing until after Ms. Dyson is sentenced. The Court granted the motion, and no date for sentencing is currently set.

¹ The parties apologize to the Court for the late filing of this status report.

5. On October 21, 2022, Ms. Dyson entered a guilty plea pursuant to a plea agreement to Count One of the indictment. Her sentencing originally was set for January 20, 2023, but was reset to February 8, 2023.

6. As part of defendant's plea agreement, he agreed to cooperate with the government, which includes possible testimony in this case and in two other cases that are set for trial: *United States v. Darren Smith*, 21 CR 703-2 (Kendall, J.), which is set for trial in April 2023; and *United States v. Thomas Duncan, et al.*, 21 CR 86 (Seeger, J.), which is set for trial in July 2023.

7. In order to provide the Court with complete information at the time of sentencing with regard to the scope and extent of defendant's cooperation, the parties jointly request that defendant's sentencing occur after these matters are resolved, and after Ms. Dyson has been sentenced.

8. The parties request that the Court set a status hearing or, in the alternative, order that the parties submit a status report, in May 2023. At that time, the parties will be able to update the Court as to the progress of all pending matters, and whether the parties are prepared to proceed with sentencing.

Respectfully submitted,

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